

EXHIBIT M

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

KOBEAY SWAFFORD, as an individual

Plaintiff,

v.

RENTGROW, INC.;
and DOES 1-10 inclusive,

Defendants.

Case No. 1:24-cv-10509

**PLAINTIFF'S RESPONSES TO DEFENDANT RENTGROW, INC.'S
FIRST SET OF INTERROGATORIES
PRELIMINARY STATEMENT**

PRELIMINARY STATEMENT

Responding Party has not fully completed investigation of the facts relating to the case, has not fully completed discovery in this action and has not completed preparation for trial. All of the responses contained herein are based upon such information and documents which are presently available to and specifically known to this Responding Party. The following responses are given without prejudice to the Responding Party's rights to produce evidence of any subsequently discovered facts and/or documents which this Responding Party may later recall. Responding Party accordingly reserves the right to change any and all responses herein as additional facts are ascertained, as analyses are made, legal research is completed, and contentions are made. The responses contained herein are made in good faith effort to supply as much factual information and as much specification of legal conventions as is presently known. These responses are made without prejudice to Responding Party's right to present at trial such additional documentary evidence as may be hereafter discovered or evaluate

phone calls that You exchanged with Evansville from January 1, 2023 to the present. For each communication identified in response to this Interrogatory, state the date of the communication, the mode of communication (e.g., letter, text message, email, or phone call), the name of any Evansville representative who participated in the communication, and the substance of the communication.

RESPONSE: Plaintiff received a letter on August 21, 2023 from the Housing Authority of Evansville stating that he was denied due to his criminal history. This is signed by Interim Intake Specialist, Delicia Bass. Plaintiff also received a letter from Evansville Housing Authority on August 29, 2023 via email from Delicia Bass, Intake Specialist from the Evansville Housing Authority. This letter stated that they have completed his eligibility determination and an orientation has been scheduled for him on September 8, 2023.

5. Describe each apartment lease or rental application and supporting documents that You have submitted from January 1, 2020 to the present. For each application described in response to this Interrogatory, identify the date it was submitted, the landlord to which it was submitted, the terms of the prospective lease (i.e., the monthly payment, term of the lease, start date, expiration date, etc.), the outcome, and the circumstances surrounding the application. For applications that were denied, identify the reason provided by the landlord for the denial.

RESPONSE: Plaintiff applied to the Colonial Manor apartment complex in Evansville, Indiana on or about September 2023. Plaintiff does not recall a name of a potential landlord for the complex. The unit would have been a 1-year lease and Plaintiff cannot recall the monthly payment for the rental property. Plaintiff was denied housing to the Colonial Manor due to his rental history, as information reported was erroneous and outdated. No criminal history was reported on his background check report ran his application to Colonial Manor Apartments. Following the application to Colonial Manor, Plaintiff applied

to Mallards Landing in Nashville, TN on March 31, 2024. Plaintiff spoke with the leasing office at Mallards Apartment, and does not recall any individual names. The unit would have been a 1-year lease and it would have had a monthly payment of about \$1,100 per month. Plaintiff was denied housing at Mallards Apartment due to the criminal history and a minor level of collection items on his report. Plaintiff also applied to Hickory Lake Apartments, which is located in Antioch, TN. The monthly payment for this unit is \$1,037. Plaintiff applied for this unit in April 2024 and signed his lease on May 15, 2024. He was accepted and currently resides there. The landlord for this property is Anastasia Durr.

6. Identify each apartment lease that you have entered from January 1, 2020 to the present. For each lease identified in response to this Interrogatory, identify the landlord, the date that you signed it, the term of the lease, the amount of monthly rent and other charges, the address of the apartment, and the date that the lease was terminated or ended.

RESPONSE: From January 1, 2020, Plaintiff entered a single new lease with Hickory Lake Apartments located in Antioch, TN. The landlord is Anastasia Durr and the lease agreement was signed May 15, 2024. The lease term expires April 30, 2025 and the monthly rent is \$1,037. The apartment is located at 3939 Apache Trail Apt. G7, Antioch, TN 37013. The lease is currently ongoing.

7. Identify all background screening reports regarding You that have been prepared and transmitted to any employer, landlord, or other third-party since January 1, 2020. For each report, identify the date of the report, the entity or person who prepared the report, the reason that the report was prepared, to whom the report was provided, and whether the report included the Criminal Convictions.

OBJECTION: Plaintiff objects that said request is not relevant nor likely to lead to the discovery of admissible evidence.

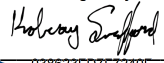
VERIFICATION

I, Kobeay Swafford , a party to this action, am authorized to make this verification. I have read the foregoing, Plaintiff Kobeay Swafford's Response to Defendant Rentgrow, Inc's First Set of Interrogatories, and know its contents thereof.

The facts stated in the foregoing responses have been assembled by authorized employees and counsel of Kobeay Swafford. I believe that the facts stated in said responses are true and correct based either upon personal knowledge or upon information supplied to me by others, which I believe to be true and correct.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on 6/11/2024 at Antioch, TN.

Date City/State

DocuSigned by:

038623FD7F7240F...

Kobeay Swafford